

EXHIBIT 9

	Proposed Date	Milestone
1.	April 26, 2024	<p>Uber shall provide (1) a list of proposed custodians. For each custodian, Uber shall provide all job titles and dates for which the custodian held that title, as well as the date(s) for any litigation holds; (2) provide a list of non-custodial files that can be produced without the use of search terms and a date certain for production.</p> <p>Plaintiffs will produce a list of proposed search terms. Note – from Ps’ 4/18 proposal (Plaintiffs produced search terms to Ds on 4/19)</p>
2.	April 29, 2024	Meet and confer re: Uber’s proposed list of custodians and production of non-custodial files.
3.	May 3, 2024	<p>Uber shall (1) serve any objections to RFPs that would result in the withholding of large portions of documents (i.e., objections that would be made to multiple RFPs); (2) identify any RFPs that Uber objects to into their entirety; (3) identify any RFPs that are fully covered by documents already produced in the JCCP and provide a date certain for producing those documents to Plaintiffs.</p> <p>Plaintiffs will submit a proposed list of initial custodians. Uber shall meet and confer with Plaintiffs re these custodians and respond by May 20 as to whether they will produce documents for them.</p> <p>Additionally, Uber will propose search terms. Note – from Ps’ 4/18 proposal</p>
4.	May 7, 2024	Meet and confer re: custodial files and search terms.
5.	May 10, 2024	Uber shall identify the custodians for which Uber will produce documents.
6.	Between May 10 and May 21, 2024	Meet and confer re: prioritizing custodial / non-custodial files per Plaintiffs’ proposal and discussion of tranche production.
7.	May 13, 2024	Meet & confer regarding search terms, custodians, and responses to RFPs
8.	May 20, 2024	Final meet and confer regarding search terms, custodians, and responses to RFPs.
9.	May 21, 2024	Uber shall serve responses and begin a rolling production of documents pursuant to Plaintiffs’ May 3 proposal and the parties’ April 29 and May 13 discussions.
10.	May 29, 2024	Uber shall serve initial objections to First Rog’s and First RFA’s.
11.	June 6, 2024	The parties will submit any dispute over search terms or custodians to the Court.
12.	June 20, 2024	Uber shall serve final objections and responses to First Rog’s and First RFA’s. (Subject to amendment or supplementation following substantial completion of non-privileged responsive documents in response to First Set of RFPs.)
13.	June 27, 2024	Uber shall serve final responses and objections to First RFPs. (Date subject to change, depending upon guidance from the court.)
14.	September 1, 2024	Uber shall substantially complete productions of non-privileged responsive documents in response to First Set of RFPs.